

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON WAVE 8 CASES LISTED IN  
EXHIBIT A OF DEFENSE MOTION TO  
EXCLUDE OPINIONS AND TESTIMONY  
OF DR. VLADIMIR IAKOVLEV (Dkt.  
6874)

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**PLAINTIFFS' AMENDED ADOPTION OF PRIOR DAUBERT RESPONSE AND  
OPPOSITION TO DEFENDANT ETHICON'S MOTION TO EXCLUDE THE  
OPINIONS AND TESTIMONY OF DR. VLADIMIR IAKOVLEV FOR WAVE 8**  
**(amended for clarification only)**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert response filed against Vladimir Iakovlev, M.D. for Ethicon Wave 4, Dkt. 3790 regarding monofilament polypropylene mesh previously disclosed in this litigation. Plaintiffs respectfully request that the Court deny Defendants' adopted motion regarding monofilament polypropylene mesh previously disclosed in this litigation, for the reasons expressed in the Wave 4 response briefing.

As to Defendants' motion regarding Mersilene mesh, leadership hereby adopts the Response filed October 25, 2018, in Ethicon MDL, 2:12-MD-2327, Dkt. number 7045.

Dated: October 29, 2018

Respectfully submitted,

/s/ D. Renee Baggett

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett \_\_\_\_\_  
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